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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

**DEFENDANTS' RESPONSE TO
"NOTICE" AT ECF NO. 213**

Case No. 2:24-cv-00421-DBB

District Judge David Barlow
Magistrate Judge Jared C. Bennett

NOW COME the Defendants, by and through their undersigned counsel, and file this Response to the Plaintiff's "Notice" at ECF No. 213.

Defendants respectfully submit that none of the material in Plaintiff's "Notice" is relevant or admissible in support of any contention in this case, and therefore assert that the material should be disregarded. Additionally, however, Defendants note that the Plaintiff's "NOTICE" appears to have been frivolous, materially false, or to have been filed in bad faith. See Exhibit A. Specifically, the Plaintiff stated in ECF No. 213 that Joshua Moon had committed "a felony" and that the Plaintiff would provide a case number "after he meets with the detectives." *Id.* But the Plaintiff had no good faith basis to make such an assertion, and it appears that he has not "met with the detectives" or provided a case number in the almost three months since he made these scurrilous accusations that Defendant Joshua Moon had committed a felony.

Exhibit A. Instead, the Plaintiff has confessed that he filed his “Notice” at ECF No. 213 for an improper purpose, to wit: “because it has been annoying.” The Plaintiff has repeatedly failed to identify any good faith basis for his assertions in the pleading at ECF No. 213, including in the attached Exhibit A and in correspondence undersigned counsel sent to the Plaintiff pursuant to Fed. R. Civ. P. 11 (c) on March 26, 2025.

DATED March 26, 2025

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

*Attorney for Defendants Joshua Moon
and Lolcow, LLC*